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April 4, 2007

VIA HAND DELIVERY

Horacio Tablada
Director, Waste Management Administration
Maryland Department of the Environment
1800 Washington Blvd.
Baltimore, MD 21230

Dawn Lettman
Assistant City Solicitor
Baltimore City Law Department
101 City Hall
Baltimore, MD 21202

Matthew Zimmerman
Assistant Attorney General
Maryland Department of the Environment
1800 Washington Blvd.
Baltimore, MD 21230

Re: Swann Park

Dear HT, Matt, and Dawn:

Enclosed are a few additional documents regarding Swann Park sampling to assist you in your efforts to locate any relevant documents in each of your respective files. Please provide us with copies of any relevant documents relating to Swann Park that you are able to locate.

By providing these documents, Honeywell does not waive any claim of privilege with respect to these or any other documents related to the subject matter contained in these documents.

Very truly yours,

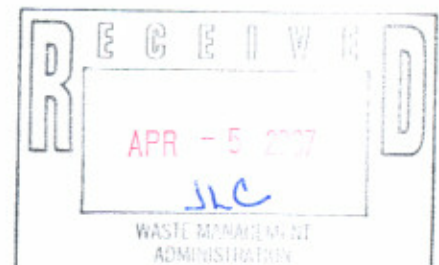


Margaret Witherup Tindall

Enclosures

cc: Michael D. Daneker (via email)
Michael C. Powell (via email)

540471.2
4/4/2007





Corporate Headquarters
P.O. Box 1057R
Morristown, New Jersey 07960

April 8, 1976

Mr. Donald H. Noren, Director
Environmental Health Administration
Department of Health & Mental Hygiene
State of Maryland
201 West Preston Street
Baltimore, MD 21201

Dear Mr. Noren:

As agreed, Allied Chemical has proceeded with analysis of samples of Swann Park and the plant on-site dump. One set of samples was taken by Messrs. Miller and Mace on March 18, 1976. A second set of samples was taken by Mr. D. Preece from Swann Park on March 23.

The data I am submitting represents our determination of the Kepone content. The data for Kepone are shown in the attached table. Analysis of other components will be forwarded by May 7, 1976.

Should there be any questions, please contact the undersigned.

Very truly yours,

W. M. Reiter
Associate Director
Pollution Control
Corp. Environmental Services

WMR/nm
cc: Dr. Max Eisenberg

bcc: J. W. Bratt
E. A. Cox
J. M. DeVoe
W. S. Ferguson
J. P. Fundersol
J. H. Hardage
J. Magliacco
R. F. Manning
J. D. Mullins
A. J. von Frank

ANALYSIS OF KEPONE CONTENT OF SWANN PARK
AND ALLIED CHEMICAL DUMP

-Analysis performed by Allied Chemical,
Baltimore Agricultural Plant, Baltimore,
Maryland-

SAMPLES COLLECTED MARCH 18, 1976

SWANN PARK

<u>Sample Number</u>	<u>Kepone Content PPM</u>
P-1	1.8
P-2	1.9

PLANT DUMP

<u>Sample Number</u>	<u>Kepone Content PPM</u>
D1S	4.7
D2S	61.0
D2C	2.8
D3S	13.0
D4S	7.0
D5S	3.0
D6S	4.0
D7S	3.0
D8S	2.5
D9S	6.0

SAMPLES COLLECTED MARCH 23, 1976

SWANN PARK BASEBALL DIAMONDS

<u>Sample</u>	<u>Kepone Content PPM</u>
Main Field	4
Field No. 1	2
Field No. 2	3
Field No. 3	1.5

Water, Soil and Mud Samples
Kepone and Arsenic Determination
To Determine Background and Area Analysis

Copy

Allied Chemical Corporation
Agricultural Division
Baltimore Plant

Water, Soil and Mud Samples
Kepone and Arsenic Determination
To Determine Background and Area Analysis

Prepared by:

E. F. Hawkins
Technical Supervisor
Baltimore Plant - Agric. Div.

Reviewed by:

original signed
J.M. DeVoe
J. M. DeVoe
Manager - Air & Water
Industrial Chemicals Division

Three groups of samples are included in this report.

A. Water Samples

Samples of the Patapsco River mostly well down river from the Plant.

B. Soil Samples

From two sod farms who have supplied sod to Swann Park and from Western Maryland track in Westport.

C. Mud Samples

From the Patapsco River shore line well down river from the Plant.

Purpose

The purpose of all of these samples and analyses is to supply background information for Kepone and Arsenic analysis in the area of the Baltimore Plant, Agricultural Division.

Analysis

The results of the analyses are tabulated on the following three tables.

These results indicate a probable Kepone background of between 223 ppb on soil and mud samples and about 0.7 to 1 ppb for water samples.

Locations

Chart A shows the locations of the water samples.

Chart B shows the locations of the mud samples.

Table A

Water Samples Taken April 23, 1976

<u>Sample</u>	<u>ppb Kepone</u>	<u>ppb Arsenic</u>
1	2.4	2
2	3.3	0
3	3.4	0
4	1.3	2
5	1.2	0
6	0.8	0
7	1.6	0
8	1.6	2
9	2.6	0
10	0.8	0
11	1.0	0
12	0.8	2
13	0.8	0
14	0.7	0
Ave.	1.6	0.6

Deionized Distilled Water 0.7 ppb Kepone

Baltimore Tap Water 0.8 ppb Kepone

Table B

Soil Samples From Princeton Turf Farm
Centerville, Maryland Taken 4/16/76

	<u>ppm Kepone</u>	<u>ppm Arsenic</u>
Farm #2	3.5	29
Farm #3	2.7	42
Farm #4	2.6	30

Soil Samples From Whites' Turf Farm
Near Mt. Airy, Maryland Taken 4/5/76

	<u>ppm Kepone</u>	<u>ppm Arsenic</u>
Daisy Rd. Farm	0.6	0
Damascus Rd. Farm	3.4	0

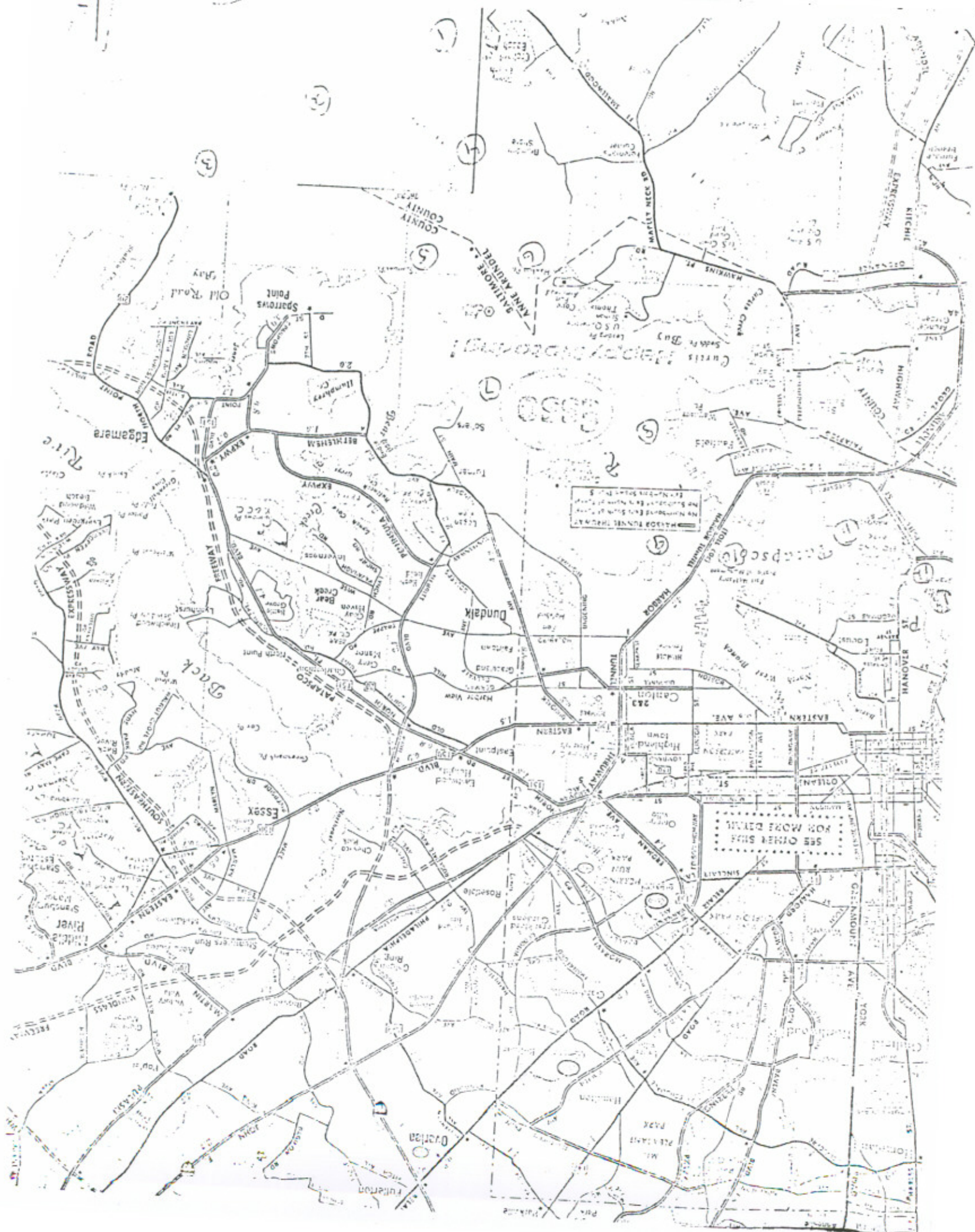
Soil Samples from Westport Area at W.M.R.R. Tracks
Across the River from Baltimore Plant Taken 3/29/76

	<u>ppm Kepone</u>	<u>ppm Arsenic</u>
East Side of Annapolis Road	1.8	4
West Side of Annapolis Road	1.7	12

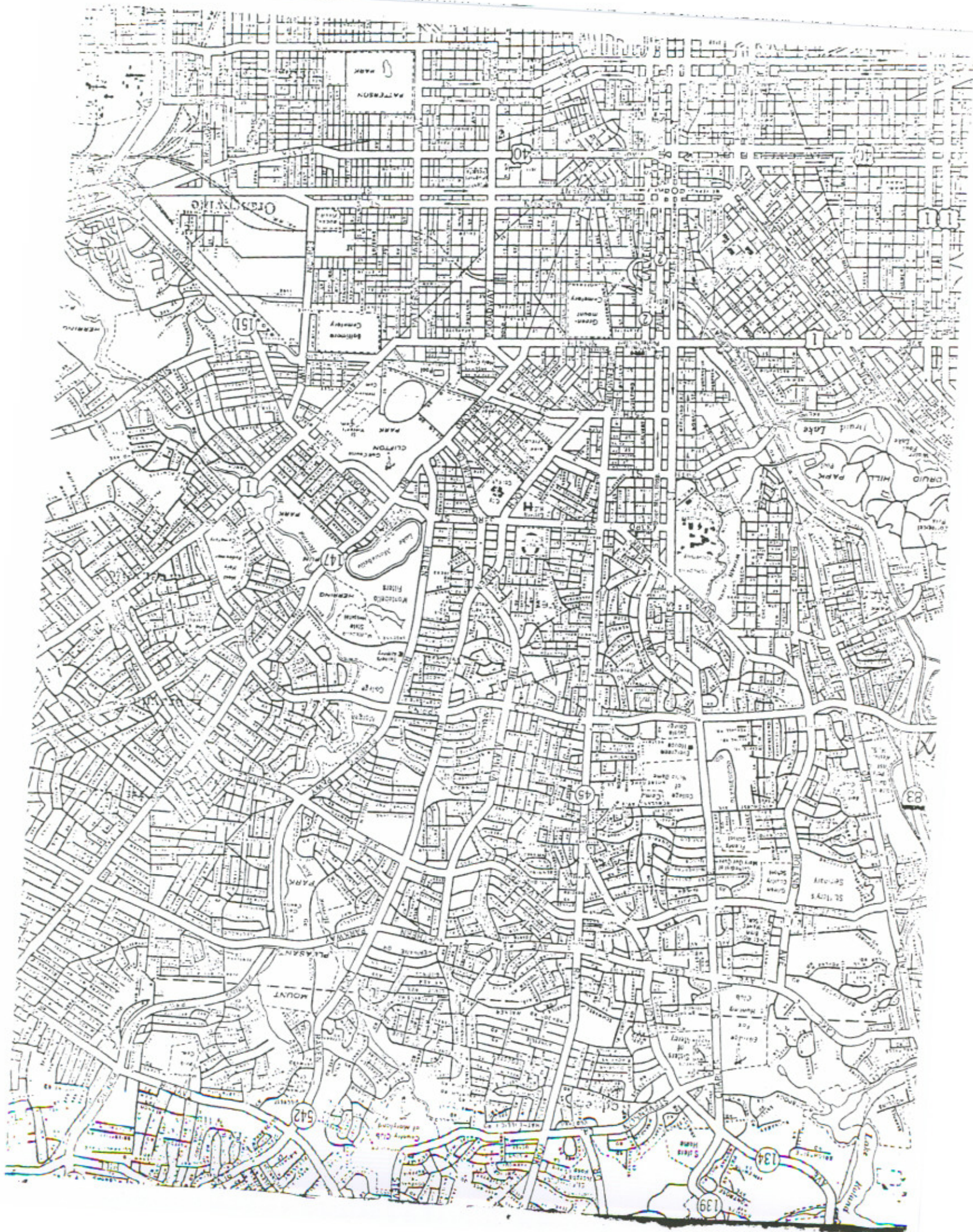
Table C

Mud Samples (Taken 4/15/76)

	<u>ppm Kepone</u>	<u>ppm Arsenic</u>
1. Middle Branch Patapsco intersection of South and Ostend Sts.	3.0	40
2. Fort Smallwood State Bank, South bathing beach	1.8	8
3. Brandon Shores Brandon Shore Road	1.8	32
4. Koester's Estate Driftwood	2.2	8
5. Fort McHenry at Southern States Co-op	2.4	66









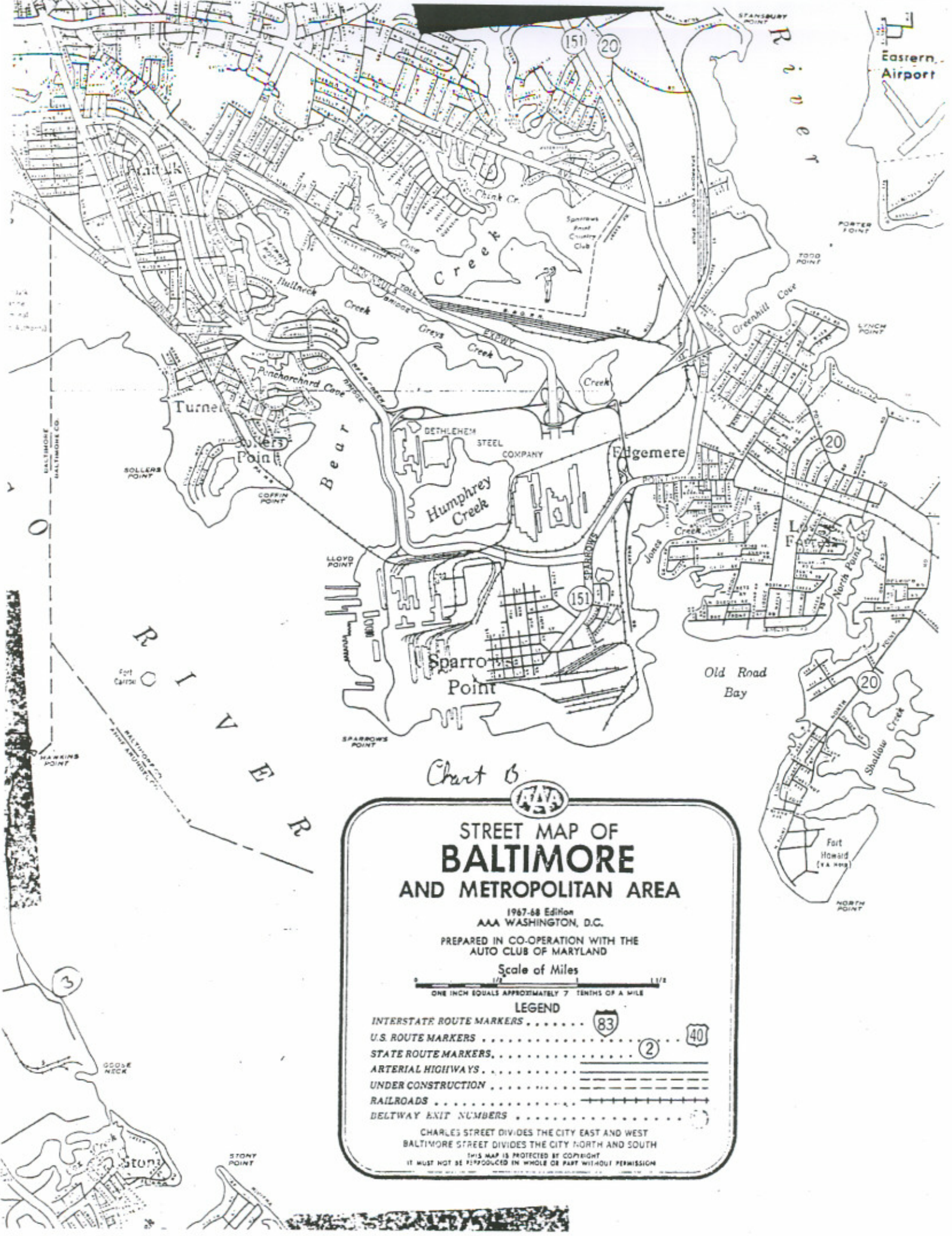


Chart B

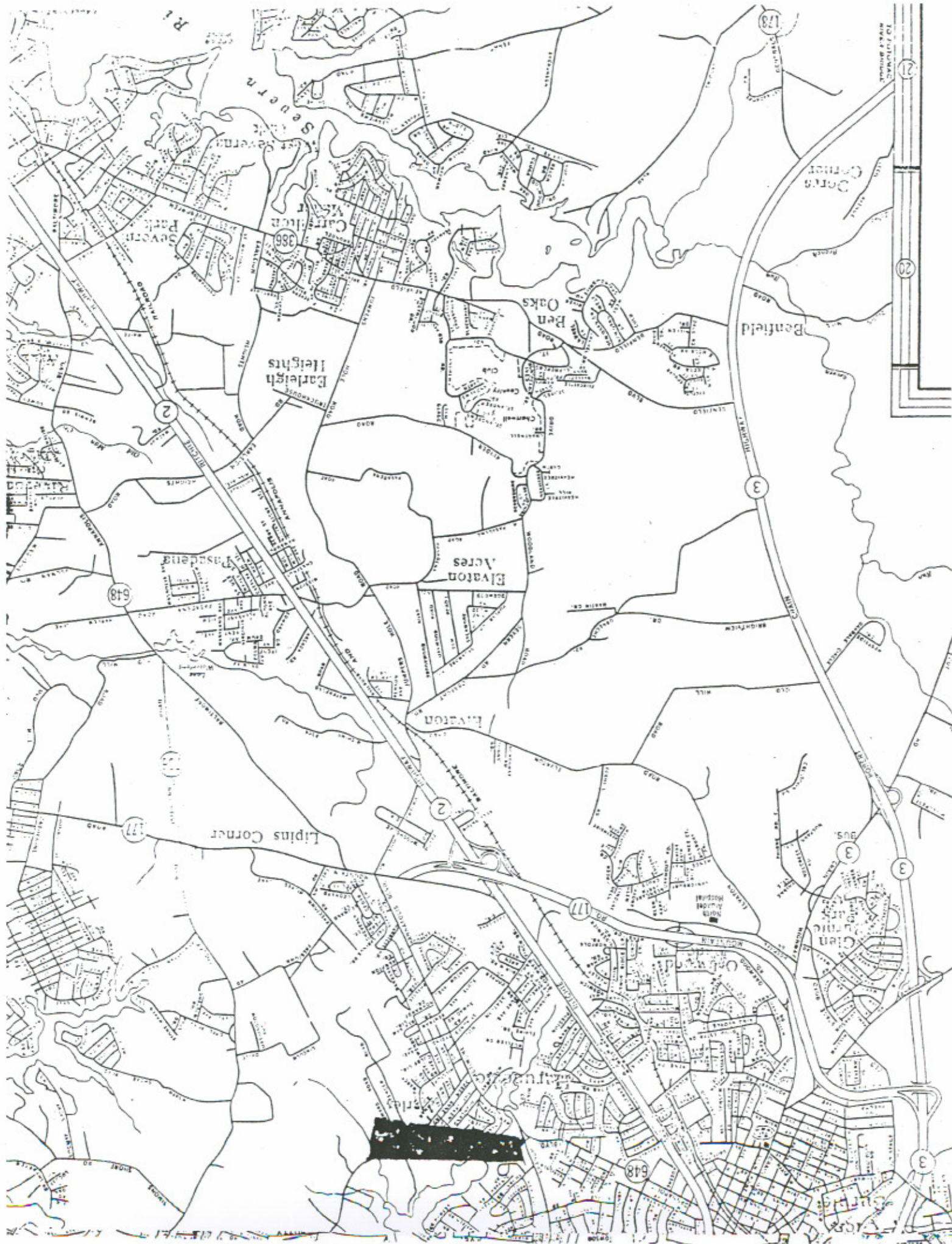
**STREET MAP OF
BALTIMORE
AND METROPOLITAN AREA**

1967-68 Edition
AAA WASHINGTON, D.C.
PREPARED IN CO-OPERATION WITH THE
AUTO CLUB OF MARYLAND

Scale of Miles
ONE INCH EQUALS APPROXIMATELY 7 TENTHS OF A MILE

- LEGEND**
- INTERSTATE ROUTE MARKERS 83
 - U.S. ROUTE MARKERS 2 40
 - STATE ROUTE MARKERS
 - ARTERIAL HIGHWAYS
 - UNDER CONSTRUCTION
 - RAILROADS
 - DELTAWAY EXIT NUMBERS

CHARLES STREET DIVIDES THE CITY EAST AND WEST
BALTIMORE STREET DIVIDES THE CITY NORTH AND SOUTH
THIS MAP IS PROTECTED BY COPYRIGHT
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ALLIED CHEMICAL CORPORATION

MEMORANDUM

May 17, 1976

TO: A. J. von Frank

SUBJECT: Maryland Kepone Task Force

On May 13, 1976 the Subcommittee on Disposal of Solid Waste met in Baltimore. Items of significance follow:

1. The Subcommittee modified the restoration requirements at Swann Park to eliminate the addition of lime to the soil within the area 50 feet from the plant fence. The lime was eliminated at the request of EPA Washington who felt that maintenance of the soil in the acid condition would reduce the chance of arsenic up-take in the grass. Restoration of the park will be initiated on May 17. Total cost to Allied Chemical is \$28,500.
2. Installation of clay over the dump site as recommended by the Subcommittee was initiated on May 12. The permit issued by the City requested that topsoil and grass cover be placed on top of the clay for erosion control. The existing temporary erosion control methods are deemed acceptable by the Subcommittee and there is no need for installation of the grass cover. The State Highway Administration will have the problem corrected with the City of Baltimore.
3. Based on Allied Chemical's comments, the Subcommittee will recommend to the Task Force that the State Highway Administration minimize excavation for footings in the dump area. Excavation will be limited to a depth above the ground water line. All excavated material will be used as fill at the site and covered with clay at Highway Administration expense. (Tentative recommendation pending completion of hydrogeological studies.) EPA Washington representative H. Trask objected to the disposal of the excavated material on site. He felt it was necessary that the entire dump site be relocated; however, he was overruled by the Subcommittee primarily on the basis that the recommendation was tentative. Some excavation by the Highway Administration is necessary since were all footings to be placed at the surface the footings would have to be backfilled at a cost of about one quarter of a million dollars.

4. The Health Administration estimates that appraisals required for condemnation of the Baltimore Plant site will not be received for approximately seven weeks. Advertising for bids is expected to be initiated in September with construction to be initiated in December.
5. The Subcommittee reviewed the proposed hydrogeological studies and supported them as a recommendation to the Task Force.
6. The Subcommittee is investigating disposal of Kepone-containing materials by incineration at the following:
 - a. American Recovery Corporation, Baltimore - operating a cement kiln. Investigation to be carried out by S. Morekas (Maryland) and H. Trask (EPA, Washington). Information on American Recovery is attached.
 - b. Fort Dietrich - Pathological incineration with a capacity of 150 lbs/hour. Minimum incineration temperature 1,750°F.
 - c. Edgewood Arsenal - Multi-hearth incinerator 300 lb/hr.
 - d. Indian Head - Incinerator in design stage. 1,800°F minimum temperature. 0.5-1.0 second retention.

The last three are federal installations; review will be conducted by EPA, Washington.

W. M. Reiter
W. M. Reiter

WMR/nm

cc: J. W. Bratt
R. L. Fawcett
W. S. Ferguson
R. F. Manning
J. D. Mullins

bcc: E. E. Cox
J. H. Hardage
J. Magliocco

AMERICAN RECOVERY

Andard Street @ Benhill Avenue

Curtis Bay

American Recovery has two (2) locations. The above site and also in Sparrows Point, Baltimore County.

At this site, hazardous chemicals, difficult to dispose of chemicals, and spent process acids and other chemicals are disposed of by the following methods:

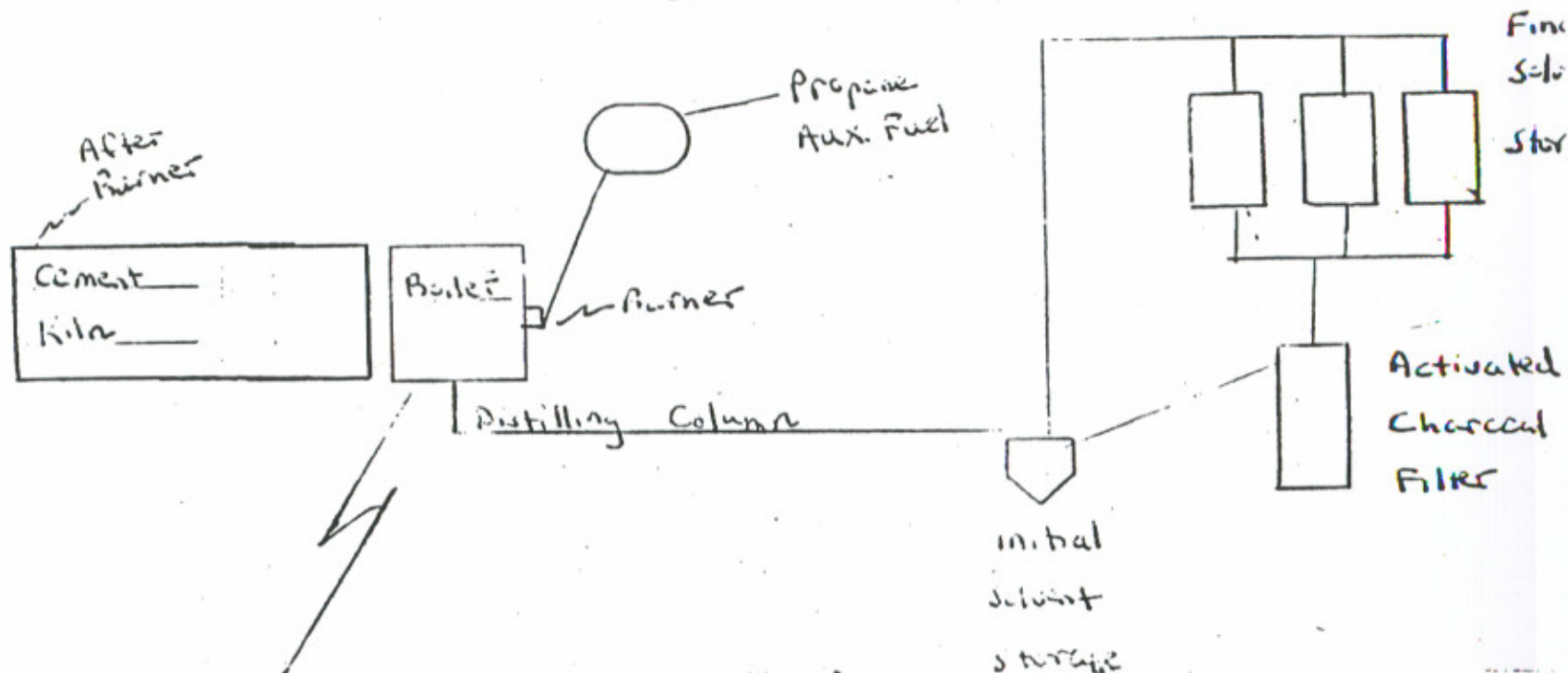
1. Sorting and pooling of small amounts of various chemicals from varied sources for disposal.
Disposal of these by:
 - a. Returning to source of manufacture.
 - b. Burning by mixing with oil fuels.
 - c. Burial of treated waste in landfills.
2. Collection of spent acids from process operations and neutralizing by treatment with lime. Treated liquids are pumped to storage lagoons (earth bank) for disposal by evaporation. Solids left by evaporation are collected for possible metal recovery or used in landfill operation.
3. Reprocessing of photographic chemicals for silver recovery by precipitation using photographic chemicals.

4. Distillation of solvent mixtures to recover the solvents and the solids.

The Company is constructing a liquid organic waste sludge recovery process. Presently, they are distilling off the solvent from a Nickel-solvent mixture. They are recovering the solvent and the dry Nickel powder. They eventually intend to use the same process for other waste organic solvent such as paint, ink, etc. The attached schematic shows the most recent process addition which was approved by the Bureau and the State in January and April 1976.

American Recovery

5-4-76 R.R.



INDIRECT FIRED (STEAM HEATED)

rotating cement type mixer

The Company is presently distilling off a solvent from a Ni-solvent mixture and recovering the dry Ni powder and the solvent. Once the cement kiln is operating, they will try to use some of the solvent as fuel and eliminate the propane.



JAN 20 1976

DEPARTMENT OF HEALTH AND MENTAL HYGIENE
ENVIRONMENTAL HEALTH ADMINISTRATION

610 N. Howard Street • Baltimore, Maryland 21201 • Area Code 301 • 383-2287
3122
3147

CONSTRUCTION PERMIT NO. 126-4419

Legal Owner & Address

Construction Site Address

Equipment Description

Basically of a batch destructive distillation reactor heated by exhaust gas from the 1300-2300 °F afterburner, and three 12,000-gal. storage tanks, vented thru an activated carbon adsorber. Organic materials to be processed shall not include paint or grease oils.

The afterburner services the non-recoverable vapor emission stream from the water-cooled condenser on the reactor.

Any deviation from the approved gas-cleaning system specifications, design criteria, drawings, etc. will void this permit. Upon completion of construction, an inspection will be made to determine the consistency of the installation with the provision of this permit.

Permit to operate is/is not required.

Notify Jim Diefel at 126-4419 of completion.

Granted this 16th day of January 1976

This permit expires one year from date of issuance unless construction is started in the interim. This permit is not transferable and is not a permit to operate.

[Signature]
Approving Officer
Chief, Division of Engineering
Bureau of Air Quality Control



DEPARTMENT OF HEALTH AND MENTAL HYGIENE
ENVIRONMENTAL HEALTH ADMINISTRATION

201 W. PRESTON STREET
BALTIMORE, MARYLAND 21201

Neil Solomon, M.D., Ph.D.
Secretary

Donald H. Noren
Director

BUREAU OF AIR QUALITY & NOISE CONTROL

PERMIT NO. _____

Date Issued _____

Expiration Date _____

This construction/operating Permit has been granted under Article 43, Section 706, Annotated Code of Maryland, to:

Legal Owner & Address

Site Address

Frederick Company Co., Inc.
1000 10th Ave.
Frederick, MD 21701

Equipment Description

1 natural gas boiler, rated at 2 million BTU/hr.
Fuel is either propane or No. 2 oil.

This permit is issued after-the-fact, the boiler having been
inspected prior to being installed.

Director, Bureau of Air Quality & Noise Control

Director, Environmental Health Administration

(NOT TRANSFERABLE)

ALLIED CHEMICAL CORPORATION

MEMORANDUM

March 12, 1976

TO: A. J. von Frank

SUBJECT: State Kepone Task Force Meeting, March 11, 1976

The initial meeting of the State of Maryland Kepone Task Force was held on March 11 in Baltimore. The undersigned and W. S. Ferguson had been requested to be in attendance to function as an informational source on the plant activities. The membership of the Task Force is listed in the attachment. The Task Force objectives are:

1. to develop ways and means for disposal of any solid waste presently on site at the Baltimore Agricultural Plant;
2. to determine whether it is necessary and, if needed, to accomplish the clean-up of any contamination external to the plant;
3. to ascertain if state waters have been violated.

The Task Force is divided into subcommittees based on area of technology involved. Preliminary reports will be required from each of the subcommittees within 10 days for submission to Dr. Solomon* and the Governor. The meeting was low key -- no press or public attendance. The Chairman specified that none of the Task Force members were to talk to the press. All contact with the news media would be made by the Chairman. The Task Force approach did not indicate any vindictiveness towards Allied Chemical. The developing program appears as a disciplined cooperative technical effort. USEPA representatives took a back seat during the discussions and during subcommittee discussions. Whether conditions will continue at a low profile will depend to a large degree on EPA's future posture. EPA, by public release of information and close auditing of State performance, could change the entire atmosphere. It is opined that the primary problem at Baltimore will not be Kepone but will be related to arsenic operations. Activities of the subcommittees were defined as follows:

HEALTH EFFECTS

The evaluation of plant neighbors and plant workers which was initiated in October 1975 will continue with completion of employee evaluations being given priority.

A. J. von Frank, Secretary, Department of Health and Mental Hygiene

3/12/76

WATER POLLUTION

The Water Resources Administration is proceeding to obtain river sediment and water samples near the plant and in the outer harbor. Coordination with the City of Baltimore, Department of Health will be effected. The Division of General Sanitation has accumulated information on the migration patterns for fish and shellfish. The samples of aquatic life will be expanded. Thus far, sampling has been limited primarily to oysters. Test results are all below 1/10 ppm Kepone with an average estimate by Dr. Eisenberg, Laboratory Supervisor, as approximately 0.03 ppm Kepone.

AIR POLLUTION

The Environmental Health Administration, Bureau of Air Quality Control intends to examine filters from four high volume samplers for Kepone. The nearest sampler is approximately 1.75 miles from the plant. A new high volume sampler will be located adjacent to the plant (site not picked as yet) to determine whether re-entrainment of Kepone from the soil is occurring. It is estimated that the sampler will be installed within approximately one week.

SOLID WASTE

The Hazardous Waste Section of the Division of Solid Waste Control plans to sample the plant dump during the coming week. The objective is to identify the extent of contamination in order to estimate a suitable disposal technique. Analyses will be performed by the State and USEPA laboratories. An extensive and systematic sampling of Swann Park is expected to be initiated next week in an attempt to evaluate the extent of contamination. Analyses on all soil samples will be for Kepone, arsenic, chlorinated organics and possibly mercury.

Presently Swann Park is closed to the public. The State is working with the USEPA in an attempt to specify concentrations of Kepone and arsenic which would be acceptable from a health standpoint. Comments by some of the participants indicated that present thinking for both arsenic and Kepone would be an allowable concentration of 1 ppm or less.

All correspondence with the Task Force is to be directed to Dr. Max Eisenberg. He will provide internal distribution.

There were two questions posed to Allied on the manufacture of Ant & Roach Paste. These will be answered by the undersigned in a letter to Dr. Eisenberg.

3/12/76

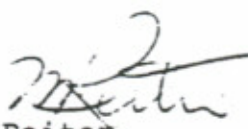
In a meeting with the Water and Solid Waste Subcommittees an agreement was reached by the undersigned that sampling of the dump site would involve six core samples taken to a depth of approximately two feet. Allied Chemical will be notified prior to the sampling of the dump and Swann Park so that split samples can be obtained. Upon completion of the sampling, Allied can proceed with the installation of a six inch clay seal on the dump site and any contaminated plant ground. The approval of this action will be obtained in writing prior to installation of the clay.

River sediment samples collected by the State will also be split with Allied.

State Highway Department will provide hydrological information to the Solid Waste group and Water Resources Administration. Highway corings which extended to a depth of 60 feet have been analyzed chemically. These data are being released to the undersigned. The highway personnel in attendance indicated that their plan would involve deposition of 6-12 feet of fill over the dump site with eventual installation of a concrete seal.

There was considerable opinion among the technical people that the best approach would be to leave the dump in its present location. A final decision on this will entail consideration of hydrological data.

The next Task Force meeting will be held on March 24 in Baltimore.


W. M. Reiter

WMR/nm

cc: J. W. Bratt

E. W. Callahan


J. M. DeVoe

W. S. Ferguson

J. Flint

J. P. Fundersol

R. F. Manning

J. D. Mullins



DEPARTMENT OF HEALTH AND MENTAL HYGIENE
ENVIRONMENTAL HEALTH ADMINISTRATION

NEIL SOLOMON, M.D., PH.D.
SECRETARY

P.O. BOX 13387
201 WEST PRESTON STREET
BALTIMORE, MARYLAND 21203
PHONE • 301-383- 2740

DONALD H. NOREN
DIRECTOR

KEPONE TASK FORCE

Donald H. Noren - Chairman

Joseph P. Lewandowski	Chief, Division of Water Quality Control Water Resources Administration Department of Natural Resources
Dr. O'Neil Banks	Executive Assistant for Technical Services Division of Labor and Industry Department of Licensing and Regulation
Frank Hoot	Assistant Commissioner of Health for Environmental Health, Baltimore City Health Department
Dr. Max Eisenberg	Assistant to the Director Environmental Health Administration
Dr. Barry Friedlander	Chief, Division of Employee and Occupational Health, Aged and Chronically Ill Administration Department of Health and Mental Hygiene
Dr. Richard Ilka	Division of Employee and Occupational Health Aged and Chronically Ill Administration Department of Health and Mental Hygiene
Alexander J. Ogrinz	Head, Product Safety Section Bureau of Food and Drugs Environmental Health Administration
Gulius D. D'Ambrogi	Director, Bureau of Food and Drugs Environmental Health Administration
Walter A. Miles	Chief, Division of Solid Waste Control Bureau of Sanitary Engineering Environmental Health Administration
George P. Ferreri	Director, Bureau of Air Quality and Noise Control Environmental Health Administration

Morris L. Hennessey	Chief, Division of General Sanitation Bureau of Sanitary Engineering Environmental Health Administration
Dr. Frances J. Warthen	Director, Center for Health Statistics Department of Health and Mental Hygiene
Dr. Jack Blanchard *	Chairman, Kepone Task Force Health Effects Division Environmental Protection Agency Washington, D.C.
Francis Alpiser	Hazardous Materials Branch Environmental Protection Agency, Region III Philadelphia, Pennsylvania
Richard H. Trainor	Chief, Interstate Division for Baltimore State Highway Administration Department of Transportation
Jon C. Crosby	Office of the Director Environmental Health Administration

NOTE: *H. Trask, EPA-Washington substituted.

3/5/76

ALLIED CHEMICAL CORPORATION

MEMORANDUM

March 22, 1976

TO: A. J. von Frank

SUBJECT: Agencies' Activities - Baltimore Agricultural Plant

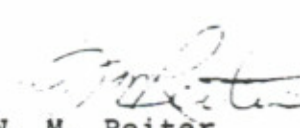
1. On March 18, 1976 F. Alpiser of EPA, Region III met with G. P. Ferreri, Director of State Bureau of Air Quality and strongly recommended that the State install three high volume samplers adjacent to the Baltimore plant for determination of airborne arsenic and Kepone. One sampler would be located at the north end of Swann Park, approximately 300 yards from the plant; the second sampler would be located immediately west of the plant on the Baltimore Electric and Gas property; the third would be located 1.75 miles south of the plant in the southeasterly direction -- site has not been identified as yet. The EPA desire is to determine whether there is any potential for health insult at this time. Allied Chemical would receive split samples and analyze for arsenic and Kepone. The State has not made any decision whether they would proceed with this program, but a decision will be forthcoming by the next Task Force meeting on March 24th.

Arsenic acid operations at the plant will cease on or about March 23.

2. EPA, Region III has decided against issuing a letter requesting detailed information from the Bureau of Air Quality. They will request a copy of the report being prepared by Allied for the Water Resources Administration under Order C-0-76-400; copy of which is attached.
3. EPA, Region III suggested to the State Hazardous Waste Section on 3/19/76 that surface soil samples be collected from the ball field areas in Swann Park and be analyzed for Kepone and arsenic.
4. The State Department of Community Sanitation has completed an initial sampling of crabs, oysters, clams and perch from the Cheseapeake Bay. The samples were taken from the Maryland-Virginia line north along both the east and west shores of the bay during the past week. No analytical data are available as yet. Analyses are being conducted for Kepone.
5. The Water Resources Administration is expected to sample river sediment and river water adjacent to the plant and at an area

March 22, 1976

approximately three miles downstream from the plant where sports fishing is active, sometime during the next two weeks. The undersigned will be advised 24 hours prior to sampling. At the moment samples are scheduled to be analyzed for Kepone and arsenic.


W. M. Reiter

WMR/nm

cc: J. W. Bratt
E. W. Callahan
~~E. A. Coker~~
J. M. DeVoe
W. S. Ferguson
J. P. Fundersol
R. F. Manning
J. D. Mullins



Corporate Headquarters
P.O. Box 1057R
Morristown, New Jersey 07960

April 5, 1976

Mr. Donald H. Noren
Director, Dept. of Health and Mental Hygiene
Environmental Health Administration
P.O. Box 13387
201 West Preston Street
Baltimore, MD 21203

Dear Mr. Noren:

Allied Chemical is gratified by the Maryland State Kepone Task Force's acceptance of our proposal concerning Swann Park made at our meeting with the Task Force on March 24, 1976, to underwrite the City of Baltimore's restoration of Swann Park up to the extent of \$100,000.

Our company's objective is to accelerate the re-opening of the park to neighborhood residents and youngsters who regularly use this important recreational facility.

This letter is merely to confirm our proposal, and we will await your guidance concerning the timing and implementation of the project.

Cordially,

A handwritten signature in cursive script, appearing to read 'W. Reiter'.

William M. Reiter
Associate Director
Pollution Control
Corp. Environmental Services

cc: Dr. Max Eisenberg

bcc: T. D. Kent
J. Flint
A. J. Kaiser
W. S. Ferguson
A. J. von Frank

E. W. Callahan
J. W. Bratt
J. P. Fundersol
J. M. DeVoe
J. H. Hardage

[REDACTED]
J. Magliocco
R. F. Manning
J. D. Mullins